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United States of America

6 IN THE UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 CAROL MALDONADO VASQUEZ,

13 Defendant.

CASE NO. 1:20-CR-00175-NODJ-BAM

STIPULATION TO SET CASE FOR CHANGE OF
PLEA AND ORDER THEREON

14

15 **STIPULATION**

16 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
17 through defendant's counsel of record, hereby stipulate as follows:

18 1. By previous order, this matter was set for a status conference on May 8, 2024, at 1:00
19 p.m.

20 2. By this stipulation, defendant now moves to vacate the status conference and set the case
21 for a change of plea hearing on June 10, 2024 at 8:30 a.m.

22 3. The parties agree and stipulate, and request that the Court find the following:

23 a) The discovery associated with this case includes case includes voluminous
24 investigative reports, wire interceptions recordings and electronic messages, precise location
25 information data, and cellular phone downloads, totaling thousands of pages of discovery and
26 several gigabytes of electronic data.

27 b) Defense counsel requests the additional time to review the discovery, meet with
28 his client, conduct independent investigation, and discuss a pretrial resolution with the

1 government. The government has provided a plea offer to the defense and defense counsel needs
2 time to review that agreement with his client.

3 c) The defendant is currently out of custody.

4 d) Counsel for the defendant believes that failure to grant the above-requested
5 continuance would deny him the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 e) The government does not object to the continuance.

8 f) The parties believe that time should be excluded, in that failure to grant the
9 requested case schedule would unreasonably deny the defendant continuity of counsel, and
10 unreasonably deny both the defendant and the government the reasonable time necessary for
11 effective preparation, taking into account the parties' due diligence in prosecuting this case. 18
12 U.S.C. Section 3161(h)(7)(B)(iv). Based on the above-stated findings, the ends of justice served
13 by the schedule as requested outweigh the interest of the public and the defendant in a trial
14 within the original date prescribed by the Speedy Trial Act. Therefore, the parties request that the
15 Court exclude the time through the change of plea hearing on June 10, 2024, from calculations
16 under the Speedy Trial Act.

17 IT IS SO STIPULATED.

18 Dated: April 29, 2024

PHILLIP A. TALBERT
United States Attorney

20 By: /s/ JUSTIN J. GILIO

21 JUSTIN J. GILIO
Assistant United States Attorney

23 Dated: April 29, 2024

/s/ Miles Harris
24 Attorney for Defendant
CAROL MALDONADO VASQUEZ

ORDER

IT IS SO ORDERED that the status conference set for May 8, 2024, is vacated. A change of plea hearing is set for **June 10, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge**. Time is excluded pursuant to 18 U.S.C. Section 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: April 30, 2024

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE